## UNITED STATES DISTRICT COURT DISTRICT OF CONNECTICUT

DAVID D. HENWOOD,	)	
Plaintiff,	)	
<b>v.</b>	)	Civil Action No. 3:01CV996(AWT) (DFM)
UNISOURCE WORLDWIDE, INC.	)	3.01C 1770(11111)
and	)	
GEORGIA-PACIFIC CORPORATION,	)	
Defendants.	)	July 15, 2004

## **DEFENDANTS' MOTION FOR EXTENSION OF TIME**

Defendants Unisource Worldwide, Inc. and Georgia-Pacific Corporation ("Defendants") respectfully move this Court for a short extension of the time period governing Defendants' reply brief in support of its Motion for Summary Judgment on Plaintiff's Promissory Estoppel Claim. Specifically, Defendant's request a one week extension of time until July 26, 2004, in which to file their reply brief.

In support of this motion, Defendants state as follows:

- 1. On November 17, 2003, Defendants filed their motion for summary judgment on all of the claims in Plaintiff David Henwood's Amended Complaint.
- By Order dated March 15, 2004, this Court granted Plaintiff leave to add a 2. claim for promissory estoppel to his Amended Complaint.
- 3. On June 1, 2004, Defendants filed their motion for summary judgment on Plaintiff's promissory estoppel claim. Plaintiff sought, and Defendants consented to, a one

week extension of time for Plaintiff to file his opposition brief. Then, on July 1, 2004, Plaintiff served his opposition papers on Defendants by mail.

- 4. Defendants reply brief is therefore currently due on or before July 19, 2004.
- 5. In order to have sufficient time to reply to Plaintiff's opposition papers, Defendants are seeking a one week extension of time, until July 26, 2004, in which to file their reply brief.
- This is the first request made by Defendants for an extension of time in which 6. to file this reply brief.
- 7. Defendants have conferred with Plaintiff's counsel about this request and Plaintiff's counsel consents to the requested extension.
- 8. For the reasons set forth above, Defendants respectfully assert that good cause exists for the granting of this motion.

For these reasons, Defendants respectfully request that this Court grant this motion and extend the deadline for filing their reply brief until July 26, 2004.

THE DEFENDANTS,

UNISOURCE WORLDWIDE, INC. and GEORGIA-PACIFIC CORP.

Gregory B. Nokes (ct06905) McCARTER & ENGLISH

CityPlace I, 185 Asylum Street

Hartford, CT 06103-3495

(860) 275-6700

C. Randolph Sullivan (ct22795)

Kimberlee W. DeWitt (ct23825)

**HUNTON & WILLIAMS** 

951 East Byrd Street

Richmond, VA 23219

(804) 788-8200

## **CERTIFICATE OF SERVICE**

This is to certify that a copy of the foregoing was sent by U.S. Mail, postage prepaid, to the following counsel of record on this 15th day of July, 2004:

> Daniel M. Young WOFSEY, ROSEN, KWESKIN &KURIANSKY, LLP 600 Summer Street Stamford, CT 06901-1490

> > Gregory D. Nokes

HARTFORD: 619065.01